



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
 77 WEST JACKSON BOULEVARD  
 CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUN 20 2012

S-6J

**Ex. 6 - Personal Privacy**

Re: Wolverine World Wide Tannery Site, Rockton, MI

Dear **Ex. 6 - Personal Privacy**


This letter is in response to your petition to the U.S. Environmental Protection Agency, Region 5, dated June 21, 2011 requesting an investigation of the Wolverine World Wide, Inc. Tannery Site, located at 123 North Main St. in Rockford, Michigan under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). EPA has conducted a Preliminary Assessment, as described in 40 C.F.R §§ 300.419(c) and 300.420, to determine whether a CERCLA action is warranted at the Site.

The Michigan Department of Environmental Quality (MDEQ) and EPA's Superfund Removal Program participated in the Preliminary Assessment. It is likely that contaminated groundwater discharges to the Rogue River. Elevated levels of several inorganic contaminants have been detected in the surface and subsurface soils in portions of the Site. Chromium, arsenic and mercury have been detected in sediment samples. Arsenic and chromium have also been detected in groundwater. However, EPA has concluded that a CERCLA removal response action is not warranted at this time, since the concentration and quantity of known contaminants do not present an immediate and substantial threat of release.

The Preliminary Assessment did determine that the Site scores above 28.50 in EPA's Hazardous Ranking System and merits further investigation. MDEQ has recommended that the Site be referred to it for further investigation under "Other Cleanup Authority". EPA has concluded that such a referral is appropriate for the Site. MDEQ has based its request for referral upon receiving a letter from Wolverine World Wide (dated June 11, 2012) in which they commit to working with the MDEQ under Section 14b of Part 201. Section 14b requires MDEQ approval of the work being conducted. We wish to emphasize, however, that by making such a referral, EPA does not waive our authority under CERCLA. We will periodically review the work being performed at the Site, retain our enforcement authority, and reserve the ability to resume the status of lead agency if necessary. For this Site, MDEQ has agreed to report to EPA at least twice a year.

If you have any further questions, please contact Nuria Muñiz, NPL Coordinator, at (312) 886-6312 or [nuria.muniz@epa.gov](mailto:nuria.muniz@epa.gov) or Tom Williams, Associate Regional Counsel, at (312) 886-5932 or [tom.williams@epa.gov](mailto:tom.williams@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Richard C. Karl". The signature is fluid and cursive, with the first name "Richard" being more prominent.

Richard C. Karl, Director  
Superfund Division

Enclosures

1. Letter from MDEQ dated June 14, 2012
2. CERCLA Preliminary Assessment Report dated June 15, 2012

cc: David Kline, MDEQ  
Ms. Heather Rueth, Kent County Conservation District  
Ms. Gail Mancewicz  
Mr. Grant Meich  
Ms. Janice L. Tompkins



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

June 14, 2012

Ms. Nuria Muniz  
National Priorities List Coordinator  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3507

Dear Ms. Muniz:

SUBJECT: Preliminary Assessment Recommendation for the Wolverine World Wide Former Tannery Site, U.S. EPA ID No. MIN000510613

The Wolverine World Wide Former Tannery site is a former tannery operation that operated from 1908 to 2010. The site was operated by and is currently owned by Wolverine World Wide (WWW). The site is located along the east bank of the Rogue River in a residential/commercial area of the city of Rockford, Michigan. A designated recreational trail is located on the west side of the site along the bank of the Rogue River. A limited environmental investigation of the site has documented releases of tannery related wastes including hexavalent chromium. The company has demolished most of the plant buildings and has reported that they have removed some wastes from the site. The waste contaminant concentrations, however, were never documented and confirmation samples were never collected after the removal of the wastes. There are four known source areas that are relatively small but the full extent of these areas has not been determined.

Groundwater samples from on-site monitoring wells have indicated an observed release of contaminants from the site to the groundwater. All residents within the 4-Mile Target Distance Limit (TDL) utilize groundwater for drinking water. Residents in the immediate vicinity of the site are served by the city of Rockford municipal system which utilizes groundwater wells located approximately one mile southeast of the site.

Analysis of sediment samples collected from the Rogue River adjacent to the site has indicated an observed release of contaminants to the surface water pathway. The surface water pathway includes Rum Creek which flows through the site, the Rogue River downstream of the site, and the Grand River downstream of its confluence with the Rogue River. The surface water pathway is used for recreation and fishing, and there are several miles of wetland frontage and several state and federal threatened and endangered species located within the 15-Mile TDL.

There is no documented evidence of adverse population exposure to soil contamination at the site. The main area of the former plant that was demolished is covered with topsoil and is fenced to restrict access. Analyses of soil samples from the west side of the site in the area of the recreational trail have revealed some elevated levels of contamination. Visual observations from along the bank of the river in this area noted waste material, such as leather and shoe scraps, tannery building flooring brick, and concrete rubble are present.

Ms. Nuria Muniz

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June 14, 2012

There are no documented samples that indicate air contamination originating from the site. Also, there is a limited potential for air migration of contaminants via windblown particulates or gas migration from the site due to the site being fairly well vegetated.

Due to the documented releases of contaminants to the groundwater and surface water pathways, the limited data evaluating only a portion of the site, and the history of the site and site operations, the site does qualify for further Superfund Site Assessment activities. However, WWW has indicated in a letter to the Michigan Department of Environmental Quality (MDEQ), dated June 11, 2012 (see enclosure), that they plan to proceed with further site investigation and remediation activities under Section 14b of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Proceeding in this manner will require WWW to submit response activity plans to the MDEQ for review and approval. WWW also stated that they are willing to discuss with the MDEQ and U.S. Environmental Protection Agency (U.S. EPA) the scope of any needed site investigation work.

Given that WWW has committed to working under Section 14b of Part 201, MDEQ staff recommends that the site be designated as "Other Cleanup Activity." It is our understanding that the U.S. EPA wants to see progress toward investigation and remediation and a continued commitment from WWW for this designation to remain in effect. If at any time in the future the U.S. EPA determines that actions at the site are not effectively remediating contamination concerns at the site, the MDEQ will work with the U.S. EPA and WWW to either address the issues or possibly redesignate the site's status in the Superfund Site Assessment process.

Please contact me if you have any questions regarding this recommendation. Any questions you may have regarding the Preliminary Assessment may be directed to Mr. Joseph Walczak, Brownfield Assessment Program Manager, Site Assessment and Site Management Unit, Superfund Section, Remediation Division, at [walczakj@michigan.gov](mailto:walczakj@michigan.gov) or 517-335-2151.

Sincerely,



Daria W. Devantier, Chief  
Site Assessment and Site Management Unit  
Superfund Section  
Remediation Division  
[devantierd@michigan.gov](mailto:devantierd@michigan.gov)  
517-373-8436

Enclosure

cc: Mr. David Kline, MDEQ

Mr. Joseph Walczak, MDEQ

Site Files – Wolverine World Wide Former Tannery, Kent County



MICHAEL L. ROBINSON

616-752-2128  
FAX 616-222-2128

mrobinson@wnj.com

June 11, 2012

**RECEIVED**

JUN 12 2012

**RD - SUPERFUND**

Mr. David O'Donnell  
District Supervisor  
Remediation and Redevelopment Division  
350 Ottawa Avenue, N.W.  
Grand Rapids, Michigan 49503

Mr. David Kline  
Remediation and Redevelopment Division  
Post Office Box 30426  
Lansing, Michigan 48909

Re: **Former Tannery Property, Rockford, Michigan**

Dear Messrs. O'Donnell & Kline:

I am writing to you on behalf of Wolverine World Wide, Inc. ("Wolverine") concerning the above-referenced property and the preliminary assessment that is being prepared by MDEQ for U.S. EPA.

Wolverine has been proceeding with its response activities (site investigation and removal action) at the property under Part 201 of the Michigan Natural Resources and Environmental Protection Act and under other statutes, as they apply.

We have indicated to both MDEQ and U.S. EPA that we plan to continue to proceed under Part 201 with respect to the property and the site. A question has apparently arisen as to whether we plan to proceed under Section 14a or Section 14b of Part 201. We will proceed under Section 14b which calls for submission of our response activity plan to the MDEQ for approval (as distinguished from Section 14a which provides for response action without MDEQ approval).

We are also willing to discuss with the MDEQ and U.S. EPA the scope of a site investigation that U.S. EPA is considering, and Wolverine may be willing to perform all or part of the site investigation.